

From: Mattox - CDPHE, Jennifer
Sent: Wednesday, March 20, 2019 04:47 PM
To: Sorrell, Virginia
CC: timakirataylor@live.com
Subject: Re: quick question

Ginny,
I've answered your questions below. Let me know if you need additional info!
j

Jennifer Mattox

Enforcement Supervisor, Oil & Gas Team
Stationary Sources Program

<https://drive.google.com/uc?export=download&id=0B8gdupL6hOgVOUNiVzVVOFZiQnc>

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"Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more."

On Wed, Mar 20, 2019 at 10:39 AM Sorrell, Virginia <Sorrell.Virginia@epa.gov> wrote:

Hi Jen,

That is very helpful. Thank you for the quick response.

To be sure that I am reading Section XVII.F correctly, Table 4 requires AIMM between one time and monthly for attainment area storage tanks, and XVII.F.4.c specifies that the tpy numbers are "estimated uncontrolled actual VOC emissions from the highest emitting storage tank." Storage tank is defined at XVII.A.16 as "any fixed roof storage vessel or series of storage vessels that are manifolded together via liquid line."

So the AIMM frequency is effectively keyed off of the well site tank battery with the highest estimated uncontrolled actual VOC emissions, as determined pre-consideration of any vapor controls?

That is how we have applied this section.

Can you give me examples other than the IR camera and Method 21 of AIMM already approved?

There are currently no other approved AIMM besides IR camera/Method 21 as defined by Reg 7 Section XVII for AIMM and LDAR monitoring requirements. We are working alongside many EPA folks, CSU, and technology providers regarding testing protocols sufficient to meet our Non-attainment area monitoring requirements. I can provide more info on this, but I'm thinking that is not the focus of your questions. Please let me know if I'm wrong and I'll provide more info.

Are storage vessels in a battery always liquids line manifolded together when they are storing the same material, or are condensate tanks sometimes just headspace manifolded together? Has Colorado seen companies not liquids line manifold vessels in an effort to avoid grouping them as a "storage tank" under Reg. 7?

I can say that I've not seen efforts to avoid grouping under Reg 7 through any enforcement/inspections, but that would be more of a permitting question I could follow up w/our permitting supervisors about. The company determines how to manifold the tanks and what materials will be put in them, and some facilities could have a "surge tank" to allow for additional headspace for emissions. My sense is that this is an infrequent practice, and industry is more moving towards reducing pressure on the systems rather than allow for additional headspace for vapors.

Thank you so much again,

Ginny

Virginia Sorrell

Air Enforcement Division

Office of Civil Enforcement

U.S. Environmental Protection Agency

Phone: 303-312-6669

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From: Mattox - CDPHE, Jennifer <jennifer.mattox@state.co.us>

Sent: Wednesday, March 20, 2019 10:20 AM

To: Sorrell, Virginia <Sorrell.Virginia@epa.gov>

Cc: timakirataylor@live.com <timothy.taylor@state.co.us>

Subject: Re: quick question

Hey Ginny,

Our requirements for tanks outside the Non-Attainment Area fall under Reg 7, Section XVII. You are correct- the control requirement is triggered by uncontrolled emissions greater than 6 tons per year VOC. Our application of the control requirement applies to the tank battery, and is not dependent on the number of tanks, only the emissions. Finally, there is not an "IR requirement," per se, but there are AIMM inspection requirements to address leak detection and prevent venting under XVII.F (LDAR) and XVII.C (venting); AIMM does allow the use of an IR camera, or Method 21, to be used to address LDAR.

Let me know if you need additional information.

Thanks,

j

Jennifer Mattox

Enforcement Supervisor, Oil & Gas Team

Stationary Sources Program

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On Wed, Mar 20, 2019 at 9:30 AM Sorrell, Virginia <Sorrell.Virginia@epa.gov> wrote:

Tim and Jen,

Can one of you confirm for me how Colorado handles tank batteries outside of the nonattainment area? What is the tpy threshold for a control requirement? Is it 6 tpy for a tank battery or single tank? Also, is there an IR camera inspection requirement for those tank batteries with a control requirement, and, if so, what is it?

This is just for comparison purposes with 0000a to correctly portray what CO is doing outside of the attainment area.

Thank you,

Ginny

Virginia Sorrell

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